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July 7, 2022

VIA ECF

Honorable Judith C. McCarthy
United States Magistrate Judge
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

RE: *United States v. Fausto Lucas*
7:18-MJ-09715-UA-1

Honorable McCarthy;

I, Dawn M. Florio, attorney at law, represent Fausto Lucas on the above case matter. Mr. Fausto Lucas has found employment with EDLEC Trucking Corp located: (Please See Attached Employment Letter)

25 E Sheffield Avenue
Englewood, NJ 07631
(201) 744-0712

It is a trucking company and the position he was hired for is a driver for 6 days a week. The company has a contract with AMAZON e-commerce and it covers the tri-state area as well as CT, DE, MD, MA, NC, VA, OH, PA & NJ. Mr. Lucas would be driving to these various locations to pick or delivery merchandise.

Mr. Lucas's travel is limited to SDNY & EDNY but I am asking the court to modify Mr. Lucas's travel to include WDNY, CT, DE, MD, MA, NC, VA, OH, PA & NJ, all for his employment. US Pretrial Officer Chin-Vilefort has alerted me that that Mr. Lucas had made unauthorized travel to

CT, NJ, and MD with this company, so I wanted to let the court know about these unauthorized travels as well.

I have spoken to AUSA Christopher Brumwell and USPTO Karina Chin-Vilefort have no objection to this request.

I am requesting that this application be acknowledged and considered.

Sincerely,

Dawn M. Florio

Dawn M. Florio, Esq.

CC: AUSA Christopher Brumwell
Pretrial Officer Karina Chin-Vilefort

APPLICATION GRANTED.

The conditions of Mr. Lucas's bond are hereby modified to allow him to travel to the Western District of New York, Northern District of New York, and the states of Connecticut, Delaware, Maryland, Massachusetts, North Carolina, Virginia, Ohio, Pennsylvania, and New Jersey (to include all federal judicial districts in those states) for employment purposes only.

Dated: July 7, 2022

SO ORDERED.



ANDREW E. KRAUSE
United States Magistrate Judge